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6/27/06

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June 27, 2006

**Delivered by Telecopy**

Heather Kennedy, Esq.  
PSS Legal Counsel/EEO Officer  
P.O. Box 501370  
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Fax: 664-3798

**Re: *Lisa Black v. PSS, et al.***

Dear Heather:

I have had a chance to review your responses to my client's Second Set of Requests for Production and have a few concerns. Please consider this an attempt to meet and confer in good faith so that we can get these issues worked out without seeking the Court's intervention. I am confident that we can do so.

Firstly, I appreciate your assurances regarding Ms. Barja's information. I understand that you want to get her approval and hope that she agrees to the production under the terms of the protective order. Thank you for the heads-up and I look forward to hearing from you with her assent.

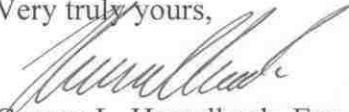
Secondly, in a number of my client's requests for production, PSS was asked to identify what documents (if any) it had in its possession and/or control that support various factual contentions it has made. Understanding that many of these documents may have already been produced, these requests asked that if that was the case, they be identified by the Bates-stamp numbers with which they have been marked. None of PSS's responses identified any of the documents with any specificity. Additionally, none of the newly-produced documents that PSS contends support the specific factual allegations were likewise not identified with any specificity.

As I am sure you know, contention-type discovery requests like these are contemplated by and allowable under our Rules of Civil Procedure. Specifically, these requests are seeking to identify which individual documents PSS will be using to support specific factual contentions. Therefore, could you please take another look at these specific requests and identify the documents that would be responsive to them with enough specificity to allow me to understand

which specific documents PSS is referring to. Since all of the documents you have produced thus far have been Bates-stamped, I suggest that this may be a convenient way of identifying them. However, if you have another way of identifying these documents, please let me know and we can see if that would work instead.

Thanks and please feel free to give me a call if you think that we can work this out.

Very truly yours,



George L. Hasselback, Esq.

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## FAX COVER SHEET

FAX NUMBER TRANSMITTED TO: 664-3713

To: Heather Kennedy, Esq.  
Of: Public School System  
From: George L. Hasselback, Esq.  
Client/Matter: **3221-01/Lisa Black**  
Date: June 27, 2006

DOCUMENTS	NUMBER OF PAGES*
Letter dated June 27, 2006.	2

\*NOT INCLUDING COVER SHEET. IF YOU DO NOT RECEIVE ALL PAGES, PLEASE TELEPHONE JENNY IMMEDIATELY AT (670) 234-5684.

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